



CODE OF ETHICS

SUPPLIERS



Mineros



Glossary of the Code of Ethics for Suppliers to Mineros:

Anti-corruption: Actions and policies to prevent bribery and other corrupt practices. Suppliers must not offer bribes or engage in conflicts of interest.

Supply Chain: Network of companies and activities involved in the production and distribution of a product or service. Mineros seeks to make its chain fair, sustainable and responsible.

Supplier Code of Ethics: Mandatory document that establishes Mineros' principles and expectations for its suppliers in the areas of ethics, compliance, human rights, and environmental protection.

Human Rights Due Diligence: A company's ongoing process to identify, prevent, mitigate and account for how its activities impact human rights.

Discrimination and Harassment: Any unfair treatment or hostile behavior based on personal characteristics (age, gender, ethnicity, etc.). Prohibited from suppliers' operations.

Circular Economy: Model of production and consumption that seeks to reduce waste and the use of resources, extending the useful life of materials.

Modern Slavery/Forced Labor: Situations in which people are forced to work under threat, coercion or abuse, including withholding documents, debt bondage or violence. Unacceptable for Mineros.

Environmental impact: Effects of a company's operations on the environment (biodiversity, ecosystems, resources, emissions, waste). Suppliers should minimize them and be responsible for damages.

Freedom of Association and Collective Bargaining: The right of employees to form or join labor unions and to negotiate their working conditions collectively, without fear of reprisal.

International Human Rights Framework: Set of global agreements and declarations that establish the fundamental rights of individuals (e.g., UN Charter, ILO declarations, UN Principles on Business and Human Rights, etc.). Mineros expects its suppliers to respect them.

Personal Data Protection: Principles and measures to ensure the lawful and secure use of personal information.

Supplier/Contractor: Company or person supplying goods or services to Mineros. They are regarded as strategic allies.

Occupational Health and Safety (OSH): Set of measures and systems to ensure a safe and healthy work environment, preventing incidents and injuries.

Child labor: Employment of children or adolescents in conditions that are illegal or detrimental to their development. Totally unacceptable for Mineros.



1. Introduction

At Mineros, suppliers are recognized as key strategic allies for the success and sustainability of its operations. This Supplier Code of Ethics sets forth the principles and expectations that guide the company's business relationships. All suppliers are expected to share Mineros' commitment to ethics, regulatory compliance, respect for human rights and the protection of people and the environment. These guidelines contribute to protect the company's value and strengthen a fair, sustainable and responsible supply chain for the well-being of all.

The Supplier Code is mandatory for all suppliers of goods and services to Mineros in its various geographies of operation.



2. International Framework and Human Rights Standards

Mineros is deeply committed to human, labor and environmental rights, based on important international frameworks such as the UN International Bill of Human Rights, ILO declarations on fundamental principles and rights at work (including Convention 169 on indigenous peoples), the Rio Declaration on Environment and Development, the UN Convention on the Rights of the Child Principles and the UN Convention against Corruption. These principles are aligned with the UN Global Compact.

In addition, Mineros recognizes and abides by the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights. We expect our suppliers to share this same level of commitment.

We encourage suppliers to adopt globally recognized responsible business and mining practices. This includes adhering to initiatives such as the UN Guiding Principles on Business and Human Rights, the International Council on Mining and Metals, and the World Gold Council's Principles for Responsible Gold Mining.

3. Supplier Responsibility

Mineros expects its suppliers to comply with the following standards:

- a) **Legal Compliance:** Suppliers must comply with both the terms of their commercial agreements and the laws, rules and regulations of the countries in which they do business with Mineros.
- b) **Human Rights and Labor Rights:** Suppliers must respect international standards on fundamental human rights in their operations, wherever they are located, and ensure that they are not complicit in human rights abuses. Suppliers must comply with all laws related to human and labor rights, including: upholding freedom of association and effective recognition of the right to collective bargaining; supporting the elimination of all forms of modern slavery, including forced and compulsory labor; supporting the effective abolition of child labor; enforcing fair and adequate employment conditions, including working hours and eliminating discrimination with respect to employment and occupation, among others (refer to Mineros HR policy).
- c) **Health and Safety:** Suppliers must implement management systems to prevent and mitigate Occupational Health and Safety (OHS) risks that ensure compliance with applicable health and safety laws and regulations at all times, as well as a safe and healthy workplace (refer to Mineros' OHS policy).
- d) **Environment:** Suppliers must demonstrate their commitment to sustainable development. Mineros encourages its suppliers to adopt sound environmental practices, such as promoting greenhouse gas reduction programs, water and energy conservation, water and air emissions management, biodiversity management, pollution controls, chemical and waste management, and recycling programs.
- e) **Business Ethics and Integrity:** Suppliers must act in accordance with responsible industry standards and practices regarding ethics and integrity (see Mineros' Corporate Anti-Bribery and Corruption Policy).



4. Management Systems

Suppliers are expected to proactively manage any vulnerabilities or risks related to the areas covered by this code. This includes having clear policies on human rights, anti-corruption, health and safety, among other things. In addition to having these policies in place, suppliers must implement effective management systems that enable them to:

- Apply these policies in their daily operations.
- Assess and mitigate social, environmental, health and safety, and human rights risks.
- Establish defined roles and responsibilities for policy implementation, risk tracking and monitoring, and the application of controls and management measures.
- Communicate and report transparently on its management to the different stakeholders.

All these actions are fundamental for the correct application of this Code and will serve as evidence during audits and performance evaluations that Mineros may perform within the framework of the contractual relationship.



5. Implementation and Compliance

Mineros takes non-compliance with the Supplier Code of Ethics and current legislation in its areas of operation very seriously. Therefore, the company reserves the right to evaluate its suppliers' compliance with this Code. For this assessment, the scope and applicability of the requirements shall be considered depending on the nature of the supplier's business and the associated risks.

Specific requirements may be defined in commercial contracts and / or agreements, as well as applicability requirements and supplier-specific DDHH targets. Mineros will be able to verify compliance. If a material breach of the Supplier Code of Ethics is evidenced, Mineros shall have the right to terminate the contractual relationship.



6. Verification and Monitoring

By accepting the Supplier Code of Ethics, the supplier commits to comply with the requirements both in its internal operations and in its supply chain. This commitment requires transparent cooperation with Mineros and the ability to demonstrate compliance when requested.

Mineros may verify the supplier's compliance with the requirements of the Code by:

- Direct dialogue.
- Self-assessment questionnaires.
- On-site audits, which may include interviews with employees and access to accurate and complete documentation and records related to the Code.
- By an independent third party appointed by the company.
- If the supplier considers that its operation does not allow full compliance with any requirement, it must communicate this to its contract manager at Mineros. This will allow us to seek adaptations to maintain a responsible relationship.

As a supplier to Mineros, care should be taken to ensure that the contractor's own suppliers comply with the requirements set forth in this Code or an equivalent set of standards. It is the supplier's responsibility to assess and monitor compliance throughout its supply chain.



7. Non-compliance and Concerns Report

If any violation of the Supplier Code of Ethics, any concern, a breach of this or local legislation is identified, it should be reported through the Mineros' Ethics Line.

More information on communication channels, how to report incidents and ask questions related to the Supplier Code of Ethics can be found at

Mineros is committed to treat all commercial and personal information received with the utmost confidentiality and responsibility. For detailed information on the handling of personal data, please refer to Mineros' Personal Data Handling Policy at www.mineros.com.



Chapter 2: Legal Compliance

a. Requirements

Suppliers must be aware of and comply with all applicable laws, regulations and international conventions. In case of conflict between local legislation and international human rights standards, suppliers must prioritize the higher standard and respect universally recognized human rights. If the requirements of this Code are more stringent than local law, the requirements of the Code shall prevail.

Any inconsistencies between the Code and applicable laws should be reported to your Mineros contract administrator.

b. Recommendations and Means of Verification

Mineros may apply for the permits, licenses and registrations legally required and valid to date. You may also ask how the supplier ensures legal compliance in the following areas: health and safety; human rights; labor rights; working conditions; environment; anti-corruption practices; customs and export control; data privacy; responsible sourcing of metals and minerals, etc.



Chapter 3: Human and Labor Rights



3.1. Due Diligence

a. Requirements

Suppliers should be aware of and address any adverse human rights impacts they cause or contribute to or that are directly related to their operations, products or services as part of their operations with Mineros.

b. Recommendations and Means of Verification

Mineros recommends that suppliers conduct human rights due diligence processes to identify, prevent, mitigate and account for business impacts on human rights. Mineros may verify compliance with this Chapter by requesting the results of human rights due diligence performed or measures (action plan) to manage impacts.

Human rights due diligence is a company's ongoing commitment to identify, prevent, mitigate and account for how its activities impact human rights. This means that companies must assess the risks in their operations and supply chains, take steps to avoid or reduce any harm, and offer remedies if their actions cause or contribute to human rights abuses. Mineros will be able to assist suppliers in the implementation of this mechanism.



3.2. Child Labor

a. Requirements

Child labor is unacceptable for Mineros. Suppliers should work to prevent child labour in their operations and supply chain and to ensure legal working conditions for young workers. If child labor is detected, the situation should be reported immediately to the ethics hotline and remediation mechanisms should be put in place in the best interest of the child.

b. Recommendations and Means of Verification

Mineros can suggest to their suppliers that they keep records of the legal working age of all their employees. This could include, for example, copies of documents verifying the age of workers.

Methods of verification: could cover the validation of an existing system to ensure that underage workers are not used.



3.3. Modern Slavery/Forced Labor

According to the ILO, modern slavery refers to situations in which people are forced to work through the use of violence or intimidation, or by more subtle means such as a manipulated debt, withholding of identity documents or threats of denunciation to immigration authorities. Modern slavery consists of forced labor, which refers not only to all work performed involuntarily, but also to cases of coercion, threat or mental and/or physical abuse, abuse of power and deception.

a. Requirements

No form of modern slavery and forced labor is acceptable to Mineros. Mineros requires that suppliers, including its contracting agencies, do not engage in or tolerate:

- Movement restrictions.
- Procurement tariffs or excessive cash deposits.
- Confiscation of identity documents and/or passports.
- Wage withholding.
- Abusive working conditions.
- Easement for debt.
- Violence or any form of forced, compulsory or illegal work, including trafficking in persons, work in prison, child slavery or work under servitude or any other exploitation or abuse.

b. Recommendations and Means of Verification

Mineros advises its suppliers to understand the risks of modern slavery in the industry and implement zero tolerance policies to prevent it. It is crucial to avoid commercial practices that could overstress suppliers, contractors and subcontractors, which could lead to modern slavery. As verification, Mineros may require that the supplier:

- It shows that overtime work is condoned.
- That employees have the right to freely leave their accommodation and place of work during their free time.
- Employees are not required to provide original personal certificates or identification documents such as government-issued IDs, passports or work permits as a condition of employment.
- There is no use of illegal disciplinary practices or economic sanctions, such as unfair or illegal deductions from wages, withholding of wages or suspension of benefits as a disciplinary measure.



3.4. Discrimination and Harassment

a. Requirements

Suppliers must respect the personal dignity, privacy and rights of each employee, and must not tolerate any kind of physical or mental harassment or abuse, expressed verbally or non-verbally. Suppliers must prohibit behavior, language and physical contact of a sexual, coercive, threatening, abusive or exploitative nature. Suppliers should not discriminate unfairly in recruitment or during the working life cycle, whether active or passive, on grounds of age, nationality or ethnicity, religion, political belief, sexual orientation, gender identity or expression, physical capacity or any other characteristic protected by law or ILO conventions.

b. Recommendations and Means of Verification

Mineros recommends that its suppliers foster a work culture free of discrimination, and strive to develop diverse teams and a workplace where people feel included and safe to contribute and challenge.

As a means of verification, Mineros may request evidence of the application and communication of hiring, compensation, employment, non-discrimination and equal opportunity practices. Or on the existence of mechanisms for reporting, investigating and sanctioning discriminatory or harassing behavior without retaliation.



3.5. Working Hours and Remuneration

a. Requirements

Working hours, overtime, breaks and permits should comply with the relevant legal requirements or applicable collective agreements. Overtime should not be the rule. Employees should at least be offered remuneration and benefits in line with the relevant legal requirements. Employees should receive remuneration and benefits in accordance with the law or agreements, and be informed of their working conditions, rights and obligations in a language they understand, ideally by means of a written contract.

b. Recommendations and Means of Verification

Mineros advises its suppliers to comply with and verify legal working hours, maintaining accurate wage records. It is essential that suppliers provide each employee with a clear and understandable payroll that details the full salary, including overtime, benefits, deductions and bonuses. In addition, employees must be informed of their working conditions, and records of these, such as copies of signed contracts, must be kept.

- As a means of verification, Mineros may require its contractors to provide evidence of:
- Recording of actual working hours, divided into normal working hours and overtime, unless otherwise agreed.
- Right to at least one day off per week and sufficient rest between shifts.
- Wages paid regularly, directly to the employee, at the agreed time and in full for the time worked during the applicable period.
- Signed employment contracts and pay slips.
- He enjoys paid statutory holidays and statutory leave, including paid sick leave and maternity or paternity leave, with no negative consequences.



3.6. Freedom of Association and Collective Bargaining

a. Requirements

Suppliers shall respect the right of employees to freedom of association, organization and collective bargaining, in accordance with local legislation. It is crucial to allow employees to designate representatives and communicate with management about working conditions without fear of retaliation. Similarly, the choice of employees who choose not to join unions or associations must be respected.

b. Recommendations and Means of Verification

Mineros recommends that its suppliers foster a work environment that allows for mutually constructive engagement between employees and management, avoiding unnecessary confrontation whenever possible. Engage in dialogue with employees about working conditions and keep records of meetings or communications conducted. As a means of verification, Mineros may require its contractors to provide evidence of:

- Right to organise and negotiate collectively.
- Right to appoint independent labor representatives and to communicate with management.
- Recognition by the supplier's management of employee representatives.
- Review of collective agreements where applicable.
- Evidence of the functioning of dialogue mechanisms between workers and management.



3.7. Land and Resource Acquisition and Property Use

a. Requirements

Suppliers must avoid any negative social, human rights, environmental or economic impacts arising from land acquisition, involuntary resettlement or land use restrictions. In the event of imposed expropriation or relocation, suppliers should ensure that a remediation plan is negotiated in a transparent manner, including, inter alia, appropriate compensation, with the aim of maintaining the means and standard of living of the persons concerned in coordination with the national and local authorities of the countries of operation.

b. Recommendations and Means of Verification

Mineros recommends that its suppliers document the ownership or lease of the land on which they operate.

It is crucial to assess the impacts of its operations, both due to changes in land tenure and the company's ongoing activities, paying special attention to vulnerable communities (rural, indigenous, women and children). If relocation or land relinquishment is required, suppliers should engage in transparent dialogues to find fair and beneficial solutions for those affected.

As a means of verification, Mineros may require its contractors to provide evidence of:

- Review of ownership or lease of land.
- Review of impact assessment and / or contingency plans where applicable.
- Review of recovery plans adopted in consultation with affected stakeholders where applicable.



3.8. Communities: Right to Participation and Information

a. Requirements

Mineros encourages its suppliers to engage appropriately with communities, ensuring the meaningful participation of communities in the operating environments and providing timely, effective and credible information on the impacts and opportunities of operations on their lives throughout the life cycle of their operations.

b. Recommendations and Means of Verification

Mineros can suggest to its suppliers to establish relationship plans and communication channels with the communities. It can also encourage them to sponsor Community initiatives in coordination with the company.

Wherever possible, suppliers should prioritise local labour, goods and services. In addition, it is essential that they assess and mitigate any negative impact of their work on the communities and their inhabitants. As a means of verification, Mineros may require its contractors to provide evidence of:

- Community Liaison Plans.
- Commitments to the community.
- Operational complaint and grievance mechanism for communities.



Chapter 4: Health and Safety

a. Requirements

Suppliers must ensure a safe and healthy work environment, preventing incidents and injuries according to the law and Mineros' guidelines. It is essential to adopt a risk-based approach to health and safety, including clear and relevant training for all employees. Workers have the right to refuse tasks representing an imminent and serious risk to their health or safety. The entire infrastructure of the place of work, including accommodation and canteens, should be regularly reviewed to maintain fire and hygiene safety standards. If accommodation is provided, each employee should have the right to his or her own bed and to a separate sleeping area for the gender with which he or she identifies.

b. Recommendations and Means of Verification

Mineros may recommend that its suppliers conduct periodic health and safety risk assessments of the company and operating sites, as well as evaluate the effectiveness of preventive and mitigation measures. As a means of verification, Mineros may require its contractors to provide evidence of:

Proper installation and maintenance of electrical wiring, lighting and gas installations.

- The existence of in-service fire alarms, suitable fire-fighting equipment, clearly marked and accessible evacuation routes and emergency exits depending on the size of the installation.
- Fire and evacuation drills conducted periodically.
- Emergency plans and response procedures.
- Appropriate control measures to mitigate health and safety risks.
- Procedures and systems for managing, tracking and reporting occupational injuries and diseases.
- Personal protective equipment and protective clothing. Employees use personal protective equipment and protective clothing that is clean, free of charge, in good working order and appropriate to the identified risks.
- Existence and easy access to relevant first-aid kits and first-aid training for employees.
- Employees do not work under the influence of drugs or alcohol.
- Clean, well-lit, adequately ventilated workplaces with acceptable temperatures and noise levels.
- Free access to clean drinking water, clean eating areas, hygienic toilets and, where appropriate, showers are provided.

**Chapter 5:**
Environment**a. Requirements**

Mineros expects its suppliers to minimize the environmental impact of their operations. This involves protecting biodiversity and ecosystems, using resources sustainably and managing land responsibly. Suppliers should adopt a risk-based approach to reduce the negative impact of their products, services and operations, taking preventive measures for any signs of environmental or public health damage.

They must also promote environmentally friendly techniques in their products, processes, designs and selection of materials. Suppliers shall be responsible

for the social, environmental and economic costs if their activities cause damage to the environment. To this end, suppliers must monitor, measure, document and plan their activities, paying special attention to the following areas to minimize their environmental impact:

- Greenhouse gas emissions (GHG).
- Circularity.
- Chemicals and hazardous substances.
- Waste - Other emissions to air, water and soil.
- Power consumption.
- Water consumption.

Mineros encourages suppliers to set GHG emission reduction targets. Suppliers with a potential material impact on Mineros' total GHG emissions should provide the contract manager at Mineros with relevant information.

b. Recommendations and Means of Verification

Mineros recommends that its suppliers conduct periodic environmental risk assessments of their value chain and measure the effectiveness of their preventive and mitigation actions. It is crucial to participate in circular economy initiatives and to preserve natural resources. They should implement appropriate practices for the management of both hazardous and non-hazardous waste.

Suppliers must also integrate environmental aspects into product development, considering the entire life cycle (from raw materials to end of use). It is important to replace hazardous chemicals with safer alternatives, to optimise energy and resource efficiency, and to increase the use of low-emission energy sources. Objectives and results related to global environmental problems, especially climate and resource efficiency / circularity, should be publicly reported.

As a means of verification, Mineros may require its contractors to provide evidence of:

- Environmental policies and commitments.
- GHG emission calculation.
- Evidence of progress measurements and efforts to minimize the company's negative impact on the environment.
- Review information on the presence of hazardous chemicals and substances of very high concern in the supplier's products.



Chapter 6: Ethics



6.1. Anti-corruption

a. Requirements

Suppliers must comply with local and international anti-corruption laws and not involve Mineros in corrupt practices. Suppliers are expected to abide by all relevant legislation, Mineros' Anti-Corruption Policy and contractual clauses. In addition, they should report any suspected non-compliance to the ethics hotline, whose contact information is available at www.mineros.com.

Suppliers must not offer bribes to Mineros employees, subcontractors or public officials. They must avoid conflicts of interest when working with Mineros and report any unavoidable conflicts. Finally, suppliers must participate transparently in Mineros' due diligence process.

b. Recommendations and Means of Verification

Mineros recommends that its suppliers establish processes to prevent corruption, for example, by implementing an anti-corruption policy and providing relevant training to their personnel. As a means of verification, Mineros may require its contractors to provide evidence of:

Related communication policies and records.

Training records, gift records, invitations and declarations of conflict of interest.



6.2. Protection of Personal Data

a. Requirements

Suppliers should follow all the principles applicable to the protection of personal data and use them only where they are legal and necessary for legitimate commercial purposes.

b. Recommendations and Means of Verification

- Apply data privacy principles
- As far as possible, inform people when and why their data are used.
- Only the types of personal data absolutely necessary to fulfil their lawful and reasonable purposes should be used.
- Store personal data only for as long as necessary to fulfill those purposes, and for as long as required by law.
- Protect your personal data by taking appropriate technical and organisational security measures and notify the relevant authorities of any personal data breaches, if required by law.
- A review of relevant documentation demonstrating that these data protection principles have been adopted by their organisation is recommended.

Supplier
Acceptance

The undersigned, authorized representative(s) of the supplier, hereby certifies, on behalf of itself and its affiliates*, that the supplier and its affiliates* accept and comply with the Supplier Code.

Full company name

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Company Identification Number

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Location

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Date

.....

Name

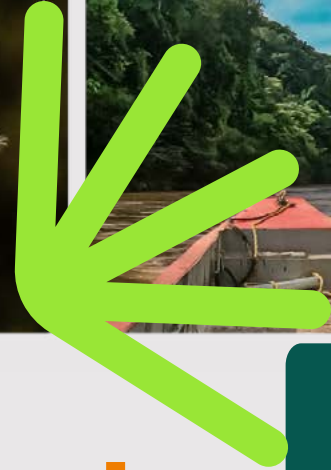
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Position

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Signature

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